

REMARKS

I. Claim Rejections – 35 U.S.C. § 102

Prima Facie Anticipation Under 35 U.S.C. § 102

A general definition of *prima facie* unpatentability under 35 U.S.C. § 102 is provided at 37 C.F.R. §1.56(b)(2)(ii):

A *prima facie* case of unpatentability is established when the information *compels a conclusion* that a claim is unpatentable under the preponderance of evidence, burden-of-proof standard, giving each term in the claim its broadest reasonable construction consistent with the specification, and before any consideration is given to evidence which may be submitted in an attempt to establish a contrary conclusion of patentability. (*emphasis added*)

"Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W.L. Gore & Associates v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303, 313 (Fed. Cir. 1983) (citing *Soundsciber Corp. v. United States*, 360 F.2d 954, 960, 148 USPQ 298, 301 (Ct. Cl.), *adopted*, 149 USPQ 640 (Ct. Cl. 1966)), *cert. denied*, 469 U.S. 851 (1984). Thus, to anticipate the Applicants' claims, the reference(s) cited by the Examiner must disclose each element recited therein. "There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention." *Scripps Clinic & Research Foundation v. Genentech, Inc.*, 927 F.2d 1565, 18 USPQ 2d 1001, 1010 (Fed. Cir. 1991).

To overcome the anticipation rejection, the Applicants need only demonstrate that not all elements of a *prima facie* case of anticipation have been met, *i. e.*, show that the reference cited by the Examiner fails to disclose every element in each of the Applicants' claims. "If the examination at the initial state does not produce a *prima facie* case of unpatentability, then without more the Applicant is entitled to grant of the patent." *In re Oetiker*, 977 F.2d 1443, 24 USPQ 2d 1443, 1444 (Fed. Cir. 1992).

Costello et al.

Claims 1, 4-7, 10 and 13-16 were rejected under 35 U.S.C. 102(b) as being anticipated by Costello et al. (USP 5,964,719) (hereinafter Costello).

The Examiner argued with regard to claims 1 and 10 that Costello discloses a method and system comprising: a) accessing an electronic portal that collects and provides ergonomic tool data to a user of said portal (Examiner cited Col. 4, lines 35-40), and b) compiling ergonomic data based on physical input provided by user to said electronic portal in order to generate ergonomic tool data to user based on physical input (Examiner cited Col. 2, lines 7-65).

The Applicant respectfully disagrees with this assessment. All the limitations of claims 1 and 10 are not disclosed by the Costello reference. Specifically, Col. 4, lines 35-40 of Costello discloses "data acquisition" that may be analyzed to identify "potentially harmful patterns and/or levels of repetitive stress". Thus, it is clear the intended function of the referenced invention is to measure "potentially harmful patterns and/or levels of repetitive stress". By contrast, claim 1 specifically discloses a method intended to provide ergonomic tool data. The two inventions differ in that the Costello reference is intended to acquire data regarding stress levels. Applicant's invention, on the other hand, goes a step further using collected data, based on physical input, to generate ergonomic tool data. This juxtaposition is intended to highlight that the two inventions are intended for completely different purposes and consequently are providing completely different output.

The Examiner cites Col. 2, lines 7-15 in support of the rejection of claims 1 and 10. Firstly, the cited material is only a discussion of the limitations of prior inventions. In addition, there is no further discussion of how the reference applies to a "workpiece". The term "workpiece" is generally refers to a piece of raw material being machined. This definition seems appropriate in light of the context from the citation in which the term is used. The present invention, however, is specifically intended to generate "tool data". Clearly the scope of the word "tool", which includes a diverse

array of equipment, extends far beyond that of a “workpiece” which has a relatively specific definition. Based on the above assessment, Costello simply does not disclose the limitations of Applicant’s claims 1 and 10.

The Examiner argued with regard to claims 4 and 13 that Costello discloses a method and system as in claim 1 and further discloses generating specific ergonomic data in response to compiling ergonomic data based on physical input provided by a user to an electronic portal in order to generate ergonomic tool data to user based on physical input (Examiner cited Col. 2 lines 7-65 and Col. 3, lines 1-11).

The Applicant respectfully disagrees with this assessment. The Applicant notes that the arguments above for claims 1 and 10 equally apply to the rejection of claims 4 and 13. In addition, in the Examiner’s response it appears the Examiner has misinterpreted part of Applicant’s argument. The Examiner seems to address only that the reference does not “show specific ergonomic data”. The Applicant stresses however that the argument was intended to make clear that the language cited by the Examiner (Col. 3, lines 1-11 of Costello) discusses collecting data about musculoskeletal stresses, but does not disclose generating tool data based on physical input from a user. The Applicant respectfully submits the difference between collecting and generating data is a significant difference between the reference and the present invention. The data generated in the present invention is dependent on and reflective of the tool, the user, and their interaction. Based on the analysis above, Costello fails to disclose each and every element of Applicant’s rejected claims 4 and 13.

The Examiner argued with regard to claims 5 and 14 that Costello discloses generating specific ergonomic data in response to compiling ergonomic data based on physical input provided by user to electronic portal in order to generate ergonomic tool data to the user based on physical input as in Claim 4 and 13 above and further discloses specific ergonomic data comprising a plurality of output variables representative of weight, twist, grasp, pull, push and motor skills of user (Examiner cited Col. 2, lines 65-67 and Col. 3, lines 1-11).

The Applicant respectfully disagrees with this assessment. First, the arguments made above regarding the rejection to claims 4 and 13 equally apply to claims 5 and 14. In addition, the Examiner has responded to the Applicant's argument by suggesting the referenced measurements sufficiently include the output variables disclosed by the Applicant. There are undoubtedly many different methods of measuring similar quantities. Indeed the same physical phenomenon may often be represented by different variables. This certainly is not evidence that shows those variables are the same thing. More importantly, the output variables disclosed in claims 5 and 14 may coincidentally represent some similar physical motion to those of the reference but are necessarily different because they serve different purposes. The Applicant reiterates Costello's sensing signals correspond to musculoskeletal stresses while Applicant's output variables correspond to movement associated with using tools. Therefore, Costello does not disclose each and every element of Applicant's rejected claims 5 and 14.

The Examiner argued with regard to claims 6 and 15 that Costello discloses generating specific ergonomic data in response to compiling ergonomic data based on physical input provided by user to electronic portal in order to generate ergonomic tool data to user based on physical input as in Claim 4 and 13 above and further discloses analyzing and comparing said specific ergonomic data to data maintained within a database to thereby provide particular tool data matching said specific ergonomic data associated with said user (Examiner cited Col. 4, lines 27-40).

Applicant respectfully disagrees with this assessment. First, the arguments made above regarding the rejection to claims 4 and 13 equally apply to claims 6 and 15. Second, in the Examiner's response to Applicant's arguments 6 and 15, the Examiner argued the reference discloses data stored in a database to be analyzed for harmful patterns. The Applicant agrees Costello discloses this but disagrees that this teaches data to data comparison as described in the present invention. There is no language in Costello suggesting the data in the database is used for comparison in analysis. Rather Costello discloses that data in the database is then analyzed

by some unspecified procedure for harmful patterns. Claims 6 and 15 however, specifically recite analysis based on comparison of ergonomic data to data maintained in the database. Thus, although both inventions include the use of a database, as is the case with many computationally related inventions, the purpose of the respective databases is completely different. As such, Costello does not disclose each and every element of Applicant's rejected claims 6 and 15.

The Examiner, with regard to claims 7 and 16, argued that Costello discloses a method and system as in claim 1 above and further discloses generating a plurality of risk factors for said user based on an analysis of ergonomic data compiled based on physical input provided by said user to said electronic portal in order to generate ergonomic tool data to said user based on said physical input (Examiner cited to Col. 2, lines 24-65).

Applicant respectfully disagrees with this assessment. First, the arguments made above regarding claim 1 equally apply to claims 7 and 16. The Applicant appreciates that the risk factors such as "high" "medium" or "low" are not included in claims 7 or 16. These terms were used only to demonstrate the significant difference between displaying real-time musculoskeletal activities and identifying potentially harmful patterns of repetitive stress, as taught by Costello, and generating a specific risk factor based on analysis of data, as described in the present invention. Costello simply identifies and displays data but does not use that data as conceived in the present invention. Based on the analysis above, Costello fails to disclose each and every element of Applicant's rejected claims 7 and 16.

Based on the aforementioned analysis, it is clear that Costello does not disclose each and every element of the rejected claims.

The Applicant reminds the Examiner that in order to succeed in a rejection to a claim or a group of claims under 35 U.S.C. 102(b), the reference cited as a basis for rejecting the claim(s) at issue must disclose each and every element of the rejected claim. If, as indicated above with respect to the requirements for prima facie anticipation under 35 U.S.C. 102 as indicated above, even one element or feature of the rejected claim(s) is

not disclosed in the cited reference, the rejection fails and must be withdrawn.

Based on the foregoing, the Applicant submits that Costello fails to disclose every element and limitation of Applicant's claims 1, 4-7, 10 and 13-16. Thus, Applicant submits that the rejection to claims 1, 4-7, 10 and 13-16 has been traversed. Therefore, Applicant respectfully requests withdrawal of the rejection to claims 1, 4-7, 10 and 13-16.

II. Claim Rejections – 35 U.S.C. § 103

Requirements for Prima Facie Obviousness

The obligation of the examiner to go forward and produce reasoning and evidence in support of obviousness is clearly defined at M.P.E.P. §2142:

The examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness.

M.P.E.P. §2143 sets out the three basic criteria that a patent examiner must satisfy to establish a *prima facie* case of obviousness:

1. some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;
2. a reasonable expectation of success; and
3. the teaching or suggestion of all the claim limitations by the prior art reference (or references when combined).

It follows that in the absence of such a *prima facie* showing of obviousness by the Examiner (assuming there are no objections or other grounds for rejection), an applicant is entitled to grant of a patent. *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443 (Fed. Cir. 1992). Thus, in order to support an obviousness rejection, the Examiner is obliged to produce evidence compelling a conclusion that each of the three aforementioned basic criteria has been met.

Costello et al. in view of Walker et al.

Claims 2, 3, 8, 9, 11, 12, and 18-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Costello et al. (USP 5,964,719) (hereinafter referred to as "Costello") in view of Walker et al. (USP 6,452,584 B1) (hereinafter referred to as "Walker").

Regarding claims 2 and 11, the Examiner argued that Costello discloses a method and system as in claims 1 and 10 above but admitted that Costello does not explicitly disclose: a) generating a three dimensional interactive graphic for display on a display screen for said user; b) prompting said user to interact with said three dimensional interactive graphic utilizing a user input device; and c) collecting ergonomic data from said user based on input provided by user through said user input device in association with said three dimensional graphic displayed on said display screen for said user. However, Examiner argued that Walker discloses a system for data management based on hand gestures and further discloses the three dimensional interactive graphic display (Examiner cited to Walker Col. 1, lines 55-60, Col. 2, lines 21-39 and Col. 3, lines 4-17). Therefore, Examiner argued that it would have been obvious to one having ordinary skills in the time of the art to add the interactive three-dimensional graphic to Costello. The Examiner stated that one would have been motivated to add the interactive graphic because it adds clarity to instructions, they can be relayed verbally or visually.

The Applicant respectfully disagrees with this assessment. Regarding Applicant's claims, neither Costello nor Walker, suggest or disclose alone or in combination with one another ALL of the claim limitations.

First, the arguments made above against the 102(b) claim rejections apply equally against all the 103 claim rejections. Additionally, as admitted by the Examiner, Costello fails to disclose the three-dimensional graphic.

Next, in the Examiner's response to the Applicant's arguments, the Examiner stated Costello and Walker use an interactive glove for manipulation of data and that the type of data is immaterial. The Applicant

assumes this is stated to show one skilled in the art would be motivated to combine these inventions. The Applicant respectfully directs the Examiner's attention to rejected claims 2 and 11 and independent claims 1 and 10. None of these claims include any language regarding an interactive glove; the exact element from Costello and Walker the Examiner relies on to show motivation for one skilled in the art to combine those references. The present invention simply is not, by nature, the same as the Walker reference.

Further, the fact that references can be combined does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. Neither of the cited references suggest the desirability of generating a three-dimensional interactive graphic for the purpose of collecting ergonomic data. While the Examiner has given an excellent explanation of the motivation for the present invention, namely because it adds clarity to instruction since it can be visually relayed, Neither Costello nor Walker even hints that such an improvement might be fostered by a combination of their elements. In addition, nothing in Costello or Walker alone or in combination would suggest to a person with ordinary skill in the art to employ creative states or inferences that would lead to Applicant's invention as described by claims 2 and 12. There is no obvious result of the combination of Costello and Walker because their operation in real time and stated purposes makes such a combination nearly nonsensical.

In light of the fact that Costello and Walker are not similar in nature and therefore not the same type of art and that neither suggests their combination might yield the improvements captured by the present invention, the requisite motivation to establish prima facie obviousness is lacking. The Applicant therefore respectfully requests the rejection of claims 2 and 11 be withdrawn.

Regarding claims 3 and 12, Examiner argued that Costello and Walker disclose a method and system as in claim 2 and 11 and Costello further discloses a user input device that comprises a motion detector configured

with a plurality of pressure and weight sensors (Examiner cited to Costello Col. 2, lines 50-59, Col. 3, line 44 to Col. 4, line 14).

Applicant respectfully disagrees that Costello and Walker disclose the elements of Applicant's claims 3 and 12. First, the arguments made for claims 2 and 11 above apply equally to claims 3 and 12. In addition, the Examiner argued in the response to Applicant's arguments that the sensors in Costello detect motion. While this may be true, Costello still fails to teach a system of motion detectors configured to operate with pressure and weight sensors. The Applicant suggests as evidence of this difference that the Applicant's own claims 3 and 12 distinguish between motion sensors and pressure and weight sensors. Surely by the Examiner's standard the pressure and weight sensors are measuring "motion" independently of the motion sensor. The "motion sensor" is included in those claims specifically because it serves an independent innovative purpose in the invention. Thus, it is of crucial importance in differentiating Costello from the present invention that the limitations of Costello fail to teach or suggests the use of motion sensors in combination with pressure and weight sensors. Costello and Walker fail to disclose each and every element of Applicant's rejected claims 3 and 12.

Regarding claims 8 and 18, Examiner argued that Costello discloses generating a plurality of risk factors for said user based on an analysis of ergonomic data compiled based on physical input provided by said user to said electronic portal in order to generate ergonomic tool data to said user based on said physical input as in claims 7 and 16 above and further discloses: a) a high risk factor, wherein ergonomic injury is likely to said user (Examiner cited Costello Col. 2, lines 60-67 and Col. 4, lines 14-40).; b) a medium risk factor, wherein on a short term basis, a substantial risk to said user is unlikely to occur (Examiner cited Costello Col. 2, lines 60-67 and Col. 4, lines 14-40); c) and a limited risk factor, wherein said user faces a highly unlikely risk of injury (Examiner cited Costello Col. 2, lines 60-67 and Col. 4, lines 14-40). However, the Examiner admitted that Costello does not disclose d) the plurality of risk factors being graphically represented for user

on a display screen as a graphical representation on a display screen of the human body. The Examiner argued that Walker discloses a graphical representation on a display screen of the human body. Therefore, Examiner stated that it would have been obvious to one having ordinary skill in the art at the time of the invention to combine graphical display with the risk factors of Costello. The Examiner further argued one would have been motivated to add the graphical display to provide visual display in addition to numerical and graph displays to show the user multiple aspects of the ergonomic data

The Applicant respectfully disagrees that both Costello and Walker disclose all the elements of Applicant's rejected claims 8 and 18. First, the arguments made above regarding the 102(b) rejections of claims 7 and 16 equally apply to the 103(a) rejections of claims 8 and 18.

The Examiner argued in response to the Applicant's arguments that Costello "looks at harmful patterns and stresses and this data will be sense to different levels patters and stress". The Applicant appreciates that Costello mentions harmful patterns of stress. However, as the Examiner notes data indicative of higher stress means higher risk. This highlights the fundamental element of the present invention Costello fails to teach. The jump from a high stress measurement to determining an activity is high risk requires a step Costello simply fails to take. For instance, how much stress suggests high risk? Might high stress measurements in one area of the body be less risky than another area? Answers to these questions are simply not given by the raw data taught by Costello. By contrast, the present invention offers a detailed analysis of what the collected data means and produces a report indicative of that analysis. Further, Costello does not teach categorization as specifically indicated in claims 8 and 18 of the present invention.

Finally, the applicant believes, as explained above, the combination of Costello and Walker would not be obvious to one skilled in the art. Nothing in the combination of Costello and Walker would suggest to a person with ordinary skill in the art to employ creative states or inferences that would

lead to Applicant's invention as described by claims 8 and 18. There is no obvious resultant invention from the combination of Costello and Walker because their operation in real time and stated purposes makes such a combination nearly nonsensical.

Walker and Costello fail to teach or suggest all the limitations of claims 8 and 18 and lack the requisite motivation necessary to establish prima facie obviousness. As such the Applicant respectfully requests the rejection of claims 8 and 18 be withdrawn.

Regarding claim 17, the Applicant notes this claim has been previously cancelled. Therefore, the Examiner's argument regarding claim 17 is moot. The Applicant respectfully requests the rejection of claim 17 be withdrawn.

Regarding claims 9 and 19, Examiner argued that Costello discloses a method and system as in claims 1 and 10, but admitted that Costello does not disclose a search engine associated with the electronic portal, wherein the search engine is accessible by said user through electronic portal to automatically identify tool data that are potentially ergonomically appropriate. However, the Examiner argued that Walker discloses allowing other programs to run with the virtual reality program for processing data. Therefore, the Examiner stated that it would have been obvious to one having ordinary skill at the time of the art to allow a processing data program to take Costello ergonomic data and find an appropriate data for user.

The Applicant respectfully disagrees with this assessment. First, the arguments made above regarding the 102 rejection for claims 1 and 10 apply equally to claims 9 and 19. In addition, the Examiner argued in response to the Applicant's arguments that data management includes several functions including query. The Applicant assumes then the Examiner is suggesting data management sufficiently teaches, specifically, the use of a search engine as claimed in the present invention. Taken to its logical conclusion, this would suggest "data management" as described by the prior art sufficiently teaches or suggests any use of any computer searching

mechanism of any kind. The Applicant simply disagrees. Neither prior art reference even hints at the use of a search engine. In addition, neither referenced invention operation would be improved with the inclusion of a search engine. The Examiner suggested the fact that Walker allows other programs to be run is somehow applicable to the present invention. The limitation in claims 9 and 19 that a search engine be used is specific. The prior art simply fails to teach this limitation. The Applicant respectfully requests that the rejection of claims 9 and 19 be withdrawn.

Finally, with regard to claim 20, Examiner argued that Costello discloses a system comprising: a) an electronic portal that collects and provides ergonomic tool data to a user of said portal (Examiner cited Costello Col. 4, lines 35-40). The Examiner admitted that Costello does not disclose an electronic portal that can be displayed graphically on a display screen. However, the Examiner argued that Walker discloses a portal being displayed graphically (Examiner cited Walker Col. 3, lines 4-17). The Examiner also argued that Walker discloses: b) a user input device, wherein said user is prompted via said display screen to interact with said three-dimensional interactive graphic utilizing said user input device. (Examiner cited Walker Col. 2, lines 21-39 and Col. 3, 4-17). Therefore, the Examiner argued that it would have been obvious to one having ordinary skills at the time of the art to add the interactive three-dimensional graphic to Costello.

The Examiner also argued that Costello discloses c) a compilation module for compiling ergonomic data based on physical input provided by said user to said electronic portal through a user input device in order to generate ergonomic data to user based on said physical input, wherein specific ergonomic data comprises a plurality of output variables representative of weight, twist, grasp, pull and motors skills (Examiner cited Costello Col. 2, line 65-Col. 3, line 11); d) an analysis module for analyzing and comparing specific ergonomic data to data maintained within a database (Examiner cited Costello Col. 4, lines 27-40); and e) generating a module for automatically generating a plurality of risk factors for user based on analysis ergonomic data compiled in response to physical input provided by user to

electronic portal via user input device (Examiner cited Costello Col. 2, lines 24-65).

Applicant respectfully disagrees with Examiner's assessment. In response to the Applicant's arguments, the Examiner argued Costello can serve as an electronic portal and it is graphically displayed. Assuming Costello can serve as an electronic portal that is not enough to teach the portal described in the present invention. A similar assertion might be that because two processes are labeled "programs" one teaches the other. The important characteristics of the "portal" in the present invention such as collecting and providing ergonomic tool data (as discussed in defense of claims 1 and 10) are not taught or suggested in Costello. The fact that the two inventions might be characterized using the same label is insufficient to establish the prima facie requirement that each and every element of the claim is taught or suggested by the prior art reference.

In addition, as argued above in favor of claim 16, there is a significant difference between displaying real-time musculoskeletal activities and identifying potentially harmful patterns of repetitive stress, as taught by Costello, and generating a specific risk factor based on analysis of data. Costello simply identifies and displays data but does not use that data as conceived in the present invention to generate a plurality of risk factors.

Finally, the Applicant asserts arguments made in favor of claims 10-16 further apply to claim 20. In the interest of brevity these arguments will not be repeated. As such, the Applicant respectfully requests the rejection of claim 20 be withdrawn.

Based on the foregoing, the Applicant submits that the Examiner's rejection to claims 2, 3, 8, 9, 11, 12, and 18-20 fails under all three prongs of the aforementioned prima facie obviousness test. First, the Examiner has not provided some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings as argued by the Examiner. Second, the Examiner has not provided an explanation of a

reasonable expectation of success for such a combination, particularly in light of the evidence above that demonstrates Costello and Walker lack the essential teaching of claim limitations such as, for example, an electronic portal that collects and provides ergonomic tool data to a user where the electronic portal can be displayed graphically on a display screen for the user and a user input device prompts a user to interact with a three-dimensional interactive graphic utilizing the user input device. Third, the Examiner has not provided for the teaching or suggestion of all the claim limitations by the prior art references when combined.

Regarding the issue of motivation with respect to the first prong of the aforementioned prima facie obviousness test, the Applicant reminds the Examiner that the language of the references may not be taken out of context and combined without motivation, in effect producing the words of the claims (and sometimes, not even the words or concepts of the claims), without their meaning or context. The resultant combination would not yield the invention as claimed. The claims are rejected under 35 U.S.C. §103(a) and no showing has been made to provide motivation as to why one of skill in the art would be motivated to make such a combination, and further fails to provide the teachings necessary to fill the gaps in these references in order to yield the invention as claimed. The rejections under 35 U.S.C. §103(a) have provided no more motivation than to simply point out the individual words of the Applicant's claims among the references, but without the reason and result as provided in the Applicant's claims and specification, and without reason as to why and how the references could provide the Applicant's invention as claimed. Hindsight cannot be the basis for motivation, which is not sufficient to meet the burden of sustaining a 35 U.S.C. §103(a) rejection.

Thus, claims 2, 3, 8, 9, 11, 12, and 18-20 of the present invention are not taught or suggested by Costello and Walker. Combining these references fails to teach or yield the invention as claimed. The combination of these references fails to teach or suggest all the elements of the claims. Further, one of skill in the art would not be motivated to make such a combination.

Therefore, the present invention is not obvious in light of any combination of Costello and Walker. Withdrawal of the §103(a) rejection to claims 2, 3, 8, 9, 11, 12, and 18-20 is therefore respectfully requested.

III. Conclusion

In view of the foregoing discussion, the Applicant has responded to each and every rejection of the Official Action. The Applicant has clarified the structural distinctions of the present invention. Applicant respectfully requests the withdrawal of the rejections under 35 U.S.C. §102(b) and §103(a) based on the preceding remarks. Reconsideration and allowance of Applicant's application is also respectfully solicited.

Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact the undersigned representative to conduct an interview in an effort to expedite prosecution in connection with the present application.

Respectfully submitted,



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